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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 CARY W. WILLIAMS,

11 Petitioner(s),

12 vs.

13 TIMOTHY FILSON, et al.,

14 Respondent(s).

Case No. 2:98-cv-00056 APG-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME
(THIRD REQUEST)**

15 Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada,
16 hereby respectfully move this Court for an order granting a five (5) day enlargement of time, to and
17 including June 4, 2019, in which to file and serve their answer to Williams' petition on remand.

18 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
19 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and
20 other materials on file herein.

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1 There have been two prior enlargements of Respondents' time to file said response, and this
2 motion is made in good faith and not for the purposes of delay.

3 RESPECTFULLY SUBMITTED this 30th day of May, 2019.

4 AARON D. FORD
5 Attorney General

6 By: /s/ Amanda C. Sage
7 AMANDA C. SAGE (Bar No. 13429)
Senior Deputy Attorney General

12 **ORDER**

13 IT IS SO ORDERED.

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16 UNITED STATES DISTRICT JUDGE
17 Dated: May 30, 2019.
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10 CARY W. WILLIAMS,

Case No. 2:98-cv-00056 APG-VCF

11 Petitioner(s),

12 vs.

13 TIMOTHY FILSON, et al.,

DECLARATION OF COUNSEL

14 Respondent(s).

15 STATE OF NEVADA)
16 CARSON CITY) : ss.

17 I, AMANDA C. SAGE, hereby state, based on personal knowledge and/or information and
18 belief, that the assertions of this declaration are true:

19 1. I am a Senior Deputy Attorney General employed by the Attorney General's Office of the
20 State of Nevada in the Bureau of Criminal Justice, Post-Conviction Unit, and I make this declaration on
21 behalf of Respondents' motion for enlargement of time in the above-captioned matter.

22 2. By this motion, I am requesting a final five (5) day enlargement of time, to and including
23 June 4, 2019, to answer Williams' petition on remand. This is Respondents' third request for an
24 enlargement.

25 3. The response is currently due May 30, 2019.

26 4. I have dedicated substantial time towards this response, including familiarizing myself with
27 a lengthy record that dates back to 1982. While the response is nearly complete, an additional 5 days
28 would give me the weekend to complete some final research and finalize my arguments. I anticipated

filings on time, however several unexpected filings in other cases in the past two weeks required quick responses that diverted my attention. These cases included oppositions to two motions for reconsideration in *Sonner v. Filson*, Case No. 2:00-cv-1101 (death penalty), and *Doyle v. Filson*, Case No. 3:00-cv-101 (death penalty) and a reply to a lengthy opposition to a motion to dismiss in *Hermansen v. Baker*, 3:17-cv-135, a case I unexpectedly took over just days before the deadline. As a result, an additional 5 days would allow me to finish my response in this matter.

5. On May 30, 2019, I contacted Randolph Fiedler, Assistant Federal Public Defender representing Mr. Williams in this matter, about my enlargement request. Mr. Fiedler indicated he had no objection to my request for enlargement.

6. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case.

Pursuant to 28 U.S.C. § 1746, Declarant herein certifies, under penalty of perjury, that the foregoing is true and correct.

DATED: May 30, 2019.

By: /s/ Amanda C. Sage
AMANDA C. SAGE (Bar No. 13429)

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 30th day of May, 2019, I served a copy of the foregoing UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (THIRD REQUEST), by U.S. District Court CM/ECF electronic filing to:

Randolph Fiedler
Assistant Federal Public Defender
411 East Bonneville Avenue, Suite 250
Las Vegas, NV 89101

/s/ Laurie Sparman